

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 1256

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION
GRANTING MAUREEN SCULLON RELIEF FROM THE AUTOMATIC STAY TO
PROCEED IN CIVIL ACTION**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On November 27, 2024, counsel for Maureen Scullon (the “**Movant**”) filed the *Motion of Maureen Scullon to Modify the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code* [D.I. 1256] (the “**Motion**”), with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

2. Counsel for the Debtors and the Movant engaged in negotiations and have jointly prepared a stipulation to resolve the Motion (the “**Stipulation**”).

3. A proposed order approving the Stipulation is attached as **Exhibit 1** hereto (the “**Proposed Order**”). The Stipulation is attached as **Exhibit A** to the Proposed Order.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

4. Counsel for the Movant confirmed their consent to entry of the Proposed Order and requested that the Debtors file a certification of counsel seeking entry of the Proposed Order.

WHEREFORE, the parties respectfully request that this Court enter the Proposed Order, substantially in the form attached as **Exhibit 1** hereto, approving the Stipulation.

[Signature page follows]

Dated: February 19, 2025
Wilmington, Delaware

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